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EPA Public Meeting  
USS Lead Superfund Project  
July 25, 2012, 6:00 PM  
City of East Chicago, Main Library

**Pubic Comment Statement**

Fernando Trevino, with FMT Consulting, representing the City of East Chicago. I have reviewed EPA's recommendation for the remediation of the USS Lead Superfund site with the City of East Chicago. EPA has recommended alternative 4A, Excavation of soil exceeding RAL's and off-site disposal, plus ex-situ treatment option, and the City DISAGREES with EPA's recommendation.

The City of East Chicago recommends EPA remediate the site via alternative 4B, Excavate to native sand, off-site disposal and ex-situ treatment, for the following reasons:

- Alternative 4A, which is EPA's choice, leaves contamination behind where it exists below 2'.
- Alternative 4B, which is the City's recommendation, provides the highest degree of long-term effectiveness and permanence because all highly contaminated soil would be removed. Removal of all highly contaminated soil is recommended because:
  - It provides the highest degree of protection of human health and environment,
  - It would reduce or avoid the costs of maintaining the soil cover,
  - It would reduce or avoid the placement of subsurface barriers/markers,
  - It would reduce or avoid the need to obtain environmental easements,
  - It would reduce or avoid the restrictions of digging in the area,
  - It would reduce or avoid notifications tied to building permit applications,
  - It would reduce or avoid notifications tied to property title transfers,
  - It is consistent with EPA's preferences, per EPA's, Superfund Lead-Contaminated Residential Sites Handbook, page 37, "Full removal of the contaminated soil satisfies EPA's preference for permanent remedies and normally allows the remediated yard to return to unrestricted use."
  - The City already faces challenging development opportunities in this area, and establishment of institutional controls on properties will certainly destroy any hope of future development whether residential

- or commercial because of the costly and burdensome task of excavating beyond 2'.
- The City has identified plans for this area that have a high probability of excavation activities going beyond 2' in the City's 5 year strategic plan, a copy which was provided to the EPA. These potential activities include.
    - Community gardens,
    - Demolition,
    - New Construction, and
    - Mixed use Development for this area.
  - It may also complicate City utility/public works projects in the area because of the costly and burdensome task of excavating beyond 2'.
  - The major difference between the two alternatives (4A and 4B) is the excavation depth of the top soil to be removed.
    - Option 4A, states a maximum of 2' of soil will be removed, and
    - Option 4B states the top soil will be removed to native sand,
    - Per EPA, soil sample results indicate native sand is at 2'; therefore, the depth of excavation in many cases may be the same under both alternatives.
  - Finally, alternative 4B, is consistent with EPA's Environmental Justice 2014 Plan. Specifically, to reference a couple of its initiatives, alternative 4B assures:
    - The development of remedies in enforcement actions to benefit overburdened communities, and will
    - Maximize benefits and minimize adverse impacts from land use.

The City's goal is to remediate this site as quickly, safely, and cost effectively as possible, and employ as many East Chicago residents and businesses as possible, with the added goal that the final remediated site will meet the City's objective to optimize the land use for the City's future.

To that point, the City would like to remind the EPA that the City has asked the EPA to pursue a bidding strategy that may include the demolition of dilapidated and abandoned homes when remediating the site.